

U S WEST, Inc.  
Suite 700  
1020 Nineteenth Street, NW  
Washington, DC 20036  
202 429-3135  
FAX 202 296-5157

DOCKET FILE COPY ORIGINAL

EX PARTE OR LATE FILED

**USWEST**

G. Michael Crumling  
Executive Director-  
Federal Regulatory

October 8, 1997

**EX PARTE**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

RECEIVED  
OCT - 9 1997  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: CC Docket No. 97-172 and File Nos. E-97-19 and E-97-40

Dear Mr. Caton:

On Wednesday, October 8, 1997, Richard Karre, U S WEST; Frank Panek, Ameritech; Ben Almond, BellSouth; Marie Breslin, Bell Atlantic and the undersigned on behalf of their companies and SBC, met with Melissa Newman, Michelle Carey, Audrey Wright of the Common Carrier Bureau and Paula Silberthau of the Office of General Counsel to discuss the provision of National Directory Assistance by the Regional Bell Operating Companies (RBOCs). The details of the discussion are provided in the attached handout.

In addition, the U S WEST representatives (Richard Karre and G. Michael Crumling) provided a clarification to U S WEST's Petition for Declaratory Ruling regarding National Directory Assistance. The Petition states that U S WEST provides no call completion with its National directory Assistance service. In the occasional instance when a National Directory Assistance operator provides an "800" number to a customer, the operator will offer to "dial" the number for that customer. If the customer agrees, the operator dials the call for customer. The call then originates from the customer's central office, and it is routed to the interexchange carrier who handles calls to that particular "800" number. Thus U S WEST essentially provides a speed dialing feature; it provides no interLATA transport for such calls. This is not "call completion" as that term is typically defined, and it raises no issue of the provision of interLATA service.

In accordance with 47 C.F.R. § 1.1206(a)(1) of Commission's rules, the original of this letter and one copy are being filed with your office. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

Sincerely,



Attachment

cc: Melissa Newman  
Michelle Carey  
Audrey Wright  
Paula Silberthau

No. of Copies rec'd  
List ABOVE

021

# NATIONAL DIRECTORY ASSISTANCE

THE RBOC COALITION

OCTOBER 8, 1997

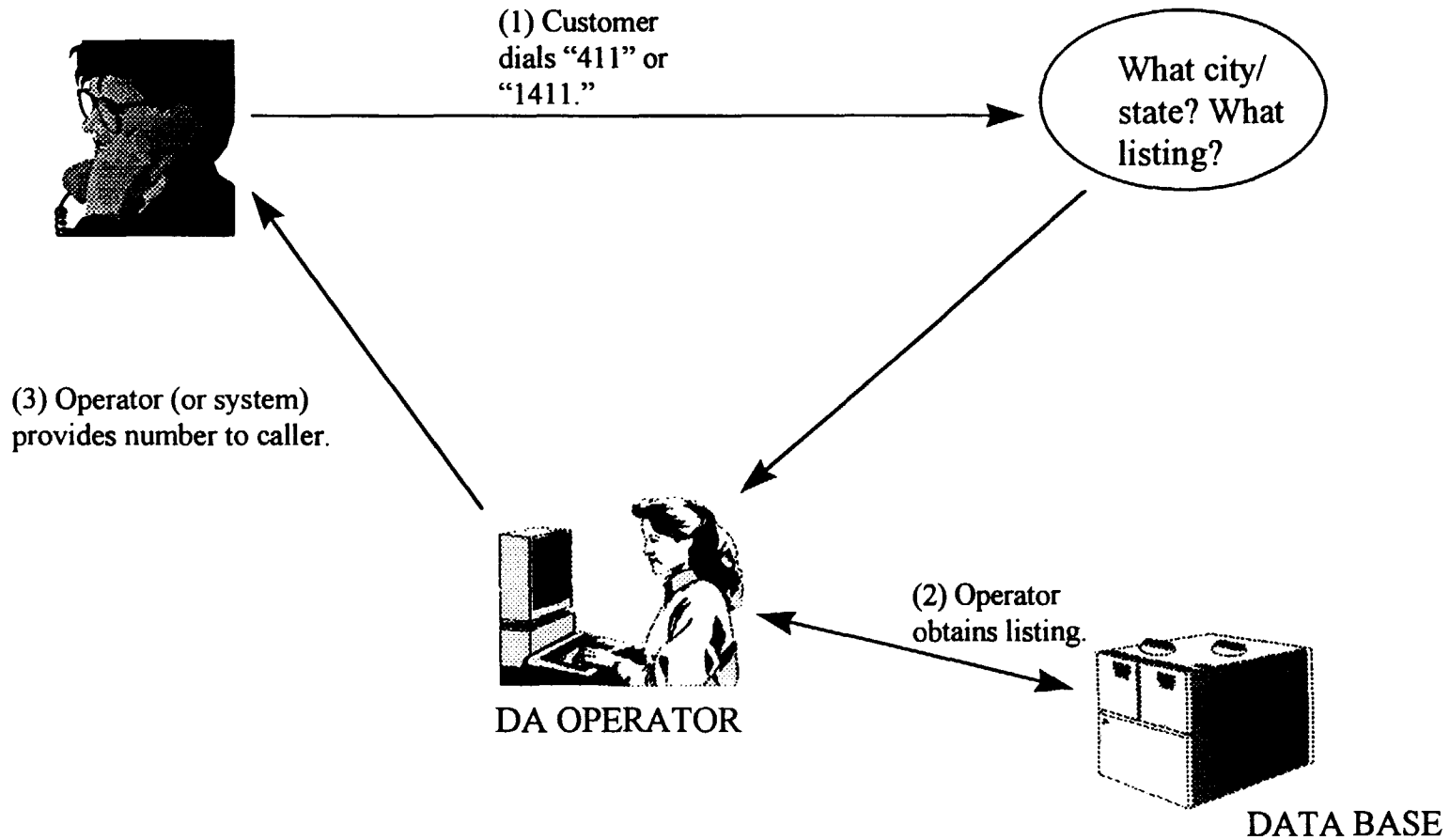
# The RBOC Coalition:

- Ameritech
- Bell Atlantic
- BellSouth
- SBC
- U S WEST

# Summary:

- Customers enjoy the convenience of National DA.
- The RBOCs are bringing the benefits of competition to National DA.
- The Communications Act does not prohibit the RBOCs from providing National DA.
- The use of “411” to provide National DA is lawful and reasonable.
- AT&T/MCI seek to avoid having to compete.

# DA Call Flow



# Customer Reaction

- Service is very popular among customers -- growing rapidly.
- Customer research (BellSouth, U S WEST) indicates customers overwhelmingly prefer the convenience of abbreviated dialing (“411,” “00”).
- IXC's, CLECs want to resell National DA.
- States want RBOCs to provide National DA.

# Competition

- “1-NPA-555-1212” - Customer’s presubscribed IXC.
- “00” - Currently, AT&T only.
  - IXC presubscribed or dial-around customers.
  - Available to any IXC.
  - As convenient as “411”.
- “411” - ILECs, CLECs
  - CLECs can select any DA provider.

# Competition

- The advent of AT&T's "00" service, demonstrates the benefits of bringing competition to national directory assistance.
  - Would AT&T have launched "00" if the RBOCs did not provide National DA?
  - Absent RBOC competition, what incentive do IXC's have to improve?



# Legal Position

- Providing out-of-LATA numbers is not “interLATA service.”
- The MFJ Court approved the use of interLATA official-service circuits to provide directory assistance.
- The FCC has not prohibited ILECs from using “411” for National DA.
- The use of “411” for National DA is reasonable and not discriminatory.

# Providing out-of-LATA numbers is not “interLATA service.”

- “InterLATA service”  
= interLATA telecommunications  
= interLATA transport.
- Providing a telephone number is not  
interLATA transport.
- No interLATA call completion.
- AT&T and MCI wish to resurrect the MFJ  
to avoid having to compete.

# Use of InterLATA Circuits

- MFJ Court allowed use of interLATA official-service circuits to provide DA.
- Nothing limits this approval to DA as it was provided by RBOCs in 1983.
- No meaningful distinction between local DA and National DA.
  - Communications between an RBOC and its customers.
- Authorized by section 271(f).

# Use of “411”

- FCC has never prohibited ILECs’ use of “411” to provide National DA.
- Use of “411” to provide National DA is reasonable and not discriminatory.
  - CLECs can use “411” to provide National DA.
  - CLECs can resell RBOCs’ National DA.
  - IXC’s can use an abbreviated dialing pattern (“00”).

# CONCLUSION

- The Act does not prohibit the RBOCs from providing National DA by means of interLATA facilities.
- The use of “411” for National DA is reasonable.
- The Commission should resolve the issues surrounding National DA in the context of U S WEST’s Petition for Declaratory Ruling.